

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Monode Marking Products, Inc.) Case No. 1:18-cv-00016-DCN
Plaintiff,)) Judge Donald C. Nugent
v.))
Columbia Marking Tools, Inc.))
Defendant.))

Motion to Extend Deadlines

Monode Marking Products, Inc. (“Monode”) respectfully moves the Court to extend all post-claim construction case deadlines, as follows:

Event	LPR	Original Deadline	Proposed Deadline
Close of Fact Discovery; Status Conference	4.7	October 28, 2019	February 25, 2020
Final Infringement Contentions	3.10(b)	October 14, 2019	February 11, 2020
Final Noninfringement, Invalidity and Unenforceability Contentions	3.10(c)	October 28, 2019	February 25, 2020
Plaintiff's Final Validity and Enforceability Contentions	3.10(d)	November 12, 2019	March 11, 2020
Initial Expert Witness Disclosures	5.1(b)	November 26, 2019	March 25, 2020
Rebuttal Expert Witness Disclosures	5.1(c)	December 26, 2019	April 24, 2020
Completion of Expert Witness Depositions	5.2	February 4, 2020	June 3, 2020
Dispositive Motion Deadline	6.1	February 14, 2020	June 13, 2020
Last Day to Conduct Trial	6.2	April 30, 2020	August 28, 2020

Monode and Columbia Marking Tools, Inc. (“CMT”) agreed on October 8, 2019, to jointly request extension of all post-claim construction deadlines. Subsequently, however, CMT has refused to jointly move to extend Monode’s final infringement contention deadline on the basis that, notwithstanding the parties’ agreement, the parties did not file a formal motion for extension before that deadline passed. But at the same time, CMT similarly let its own